

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ASETEK DANMARK A/S,

Plaintiff and
Counterdefendant,

vs.

No. 3:19-CV-00410-EMC

COOLIT SYSTEMS INC.,

Defendant and
Counterclaimant.

COOLIT SYSTEMS USA INC.,
COOLIT SYSTEMS ASIA PACIFIC
LIMITED, COOLIT SYSTEMS
(SHENZHEN) CO., LTD.

Defendants,

CORSAIR GAMING, INC., and
CORSAIR MEMORY, INC.

Defendants.

VIDEOTAPED REMOTE DEPOSITION OF
DAVID B. TUCKERMAN, Ph.D.
Lake Stevens, Washington
Thursday, December 30, 2021
Volume I, Pages 1 - 275

Reported by: CATHERINE A. RYAN, RMR, CRR,
CSR No. 8239
Job No. 4997333

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Videotaped remote deposition of DAVID B. TUCKERMAN, Ph.D., Volume I, taken on behalf of Defendant and Counterclaimant, by way of video-telecommunication with the Witness appearing in Lake Stevens, Washington, beginning at 9:04 a.m. and ending at 7:12 p.m., on Thursday, December 30, 2021, before CATHERINE A. RYAN, Certified Shorthand Reporter No. 8239.

APPEARANCES VIA VIDEO-TELECONFERENCE:

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EXHIBITS

| NUMBER | DESCRIPTION | PAGES |
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| Exhibit 289 | Drawing; 1 page | 74 |
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| Exhibit 290 | "Deposition of Donald E. Tilton, Ph.D., December 19, 2020, Asetek Danmark A/S vs. CoolIT Systems, Inc.; 177 pages | 106 |
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| Exhibit 291 | "EXPERT REPORT OF DR. DAVID B. TUCKERMAN REGARDING INFRINGEMENT OF U.S. PATENT NOS. 8,240,362; 10,613,601; AND 10,599,196"; 174 pages | 138 |
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| Exhibit 291A | "Exhibit A to Dr. David Tuckerman's Infringement Report"; 3 pages | 138 |
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1 FURTHER EXAMINATION 18:56:01

2 BY MR. R. CHEN:

3 Q Dr. Tuckerman, Ms. Bhattacharyya asked you

4 about paragraph 290 of your report in her

5 examination, correct? 18:56:11

6 A 290. 290 of --

7 Q Your report.

8 So your report is Exhibit 291, correct?

9 A I'm sorry. I was looking at 294. Okay.

10 Let me find 291. Okay. What was that paragraph 18:56:54

11 again? 290?

12 Q 290.

13 A Okay. Yes, yes.

14 Q So you see paragraph 290 of your report,

15 correct? 18:57:08

16 A Yes.

17 Q Other than Dr. Stein's report, do you cite

18 any other evidence for any opinions in paragraph 290

19 of your report?

20 A No. 18:57:22

21 Q Let's talk about the claim language just

22 before paragraph 289 in your report.

23 Do you recall Ms. Bhattacharyya asking you

24 about the claim language?

25 A Yes. 18:57:42

1 Q Okay. Does the word "curve" describe a 18:57:43
2 shape?

3 A That -- it doesn't describe a specific
4 shape. I mean --

5 Q So a curve is not a specific shape? 18:58:06

6 MS. BHATTACHARYYA: Objection. Asked and
7 answered.

8 THE WITNESS: There are many different
9 kinds of curves.

10 BY MR. R. CHEN: 18:58:18

11 Q Okay. Does the word "curve" describe a
12 category of shapes?

13 MS. BHATTACHARYYA: Objection.

14 Mischaracterizes the -- the patent. Outside the
15 scope of redirect. 18:58:43

16 THE WITNESS: Yeah. I mean, we're not
17 talking about shapes. I mean, the word "shape"
18 isn't in there.

19 BY MR. R. CHEN:

20 Q You have to answer the question I asked 18:58:55
21 you, Dr. Tuckerman.

22 A Okay. Repeat the question, please.

23 Q Sure.

24 My question is: Does the word "curve"
25 describe a category of shapes? 18:59:06

1 MS. BHATTACHARYYA: Same objections as 18:59:11
2 before.

3 THE WITNESS: It generally is understood
4 to mean, you know, something that has some curvature
5 on it. 18:59:39

6 MR. R. CHEN: Right. Right. I agree with
7 you.

8 Q So does the word "curve" cover a category
9 of shapes?

10 MS. BHATTACHARYYA: Same objection. Asked 18:59:57
11 and answered.

12 THE WITNESS: If we're talking about
13 shapes, it would describe shapes that have curvature
14 somewhere on them.

15 BY MR. R. CHEN: 19:00:17

16 Q Okay. So Ms. Bhattacharyya asked you
17 questions about the limitation where an outlet has
18 to be tangential to the circumference of the
19 impeller, correct?

20 A Yeah, of the -- the circle defined by the 19:00:43
21 tips as they -- as they rotate.

22 Q And you talked about an area of clearance
23 between the tips of the impeller and the pump volute
24 sidewall, correct?

25 A That's right. 19:01:13

1 Q Okay. Is there any evidence in your 19:01:14
2 report that you point to to show that the outlet is
3 in that area of clearance?

4 MS. BHATTACHARYYA: Objection. The report
5 speaks for itself. 19:01:33

6 THE WITNESS: One moment.

7 MR. R. CHEN: I'll -- I'll withdraw the
8 question.

9 THE WITNESS: Well, okay. I mean, I did
10 make measurements recently, but I don't see the 19:02:01
11 measurements in the report.

12 BY MR. R. CHEN:

13 Q Okay. So just to be clear, you made
14 measurements of the clearance area, but you did not
15 include those measurements in your report; is that 19:02:13
16 correct?

17 A That -- that -- I did not include specific
18 measurements in the report. I inspected the parts
19 and felt comfortable with the tangential claim,
20 but -- 19:02:33

21 Q Did you take any pictures of the
22 measurements?

23 A Well, there are -- there are pictures in
24 here.

25 Q Of the measurements. Did you take any 19:02:52

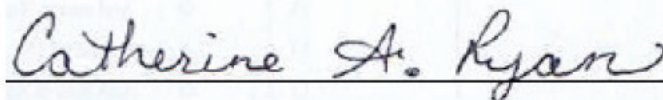
I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [X] was [] was not requested.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name: January 14, 2022.

A handwritten signature in cursive script that reads "Catherine A. Ryan". The signature is written in dark ink on a light blue background.

Catherine A. Ryan, RMR, CRR

CSR No. 8239